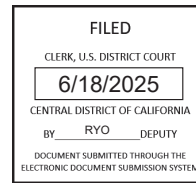


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6 *In Propria Persona*



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8 **UNITED STATES DISTRICT COURT FOR**  
9 **THE CENTRAL DISTRICT OF CALIFORNIA**  
10  
11 **WESTERN DIVISION**

12 **TODD R. G. HILL, et al,**

13  
14 **Plaintiffs**

15 **vs.**

16  
17 **THE BOARD OF DIRECTORS,**  
18 **OFFICERS AND AGENTS AND**  
19 **INDIVIDUALS OF THE PEOPLES**  
20 **COLLEGE OF LAW, et al.,**

21 **Defendants.**

CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM

**The Hon. Josephine L. Staton**  
Courtroom 8A, 8th Floor

**Magistrate Judge Brianna Fuller Mircheff**  
Courtroom 780, 7th Floor

**PLAINTIFF'S CONSOLIDATED MOTION**  
**FOR (1) CERTIFICATION OF**  
**INTERLOCUTORY APPEAL UNDER 28**  
**U.S.C. § 1292(b) AND (2) ENTRY OF**  
**PARTIAL FINAL JUDGMENT UNDER**  
**RULE 54(b)**

**NO ORAL ARGUMENT REQUESTED**

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**PLAINTIFF'S CONSOLIDATED MOTION FOR (1) CERTIFICATION OF INTERLOCUTORY APPEAL**  
**UNDER 28 U.S.C. § 1292(b) AND (2) ENTRY OF PARTIAL FINAL JUDGMENT UNDER RULE 54(b)**

CASE 2:23-CV-01298-JLS-BFM

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**PLAINTIFF’S CONSOLIDATED MOTION FOR (1) CERTIFICATION OF  
INTERLOCUTORY APPEAL UNDER 28 U.S.C. § 1292(b) AND (2) ENTRY OF PARTIAL  
FINAL JUDGMENT UNDER RULE 54(b)**

TO THE HONORABLE COURT AND ALL PARTIES OF RECORD:

Plaintiff TODD R.G. HILL respectfully submits this consolidated motion seeking either:

(1) certification for interlocutory appeal under 28 U.S.C. § 1292(b), or in the alternative,

(2) entry of partial final judgment under Rule 54(b), as to the Court’s May 27, 2025 order (Dkt. 312) denying Plaintiff’s Rule 59(e) motion related to the dismissal of the State Bar Defendants and those causes of action dismissed with prejudice.

The order denied Plaintiff’s Motion to Alter or Amend Judgment under Rule 59(e) and/or for Relief from Judgment under Rule 60(b), which sought reconsideration of prior rulings, preservation of rights, and relief from procedural irregularities and omissions. This request is timely under Federal Rule of Appellate Procedure 4(a)(1)(A), as it is filed within 30 days of entry of the order.

If the Court declines both certification and Rule 54(b) judgment, Plaintiff’s right to meaningful appellate review may be prejudiced. Given that Dockets 197, 199, and 241 appear not to have been timely considered or ruled upon prior to the dismissal of Plaintiff’s claims with prejudice, the current posture risks compounding error across future stages of litigation and undermining the finality that Rule 54(b) is designed to safeguard.

A copy of the docketed order is attached hereto as Exhibit A for the Court’s reference.

**I. INTRODUCTION**

The Court’s order at Docket 312 denied Plaintiff’s motion to alter or amend judgment (Dkt. 263) as to the dismissal of the State Bar Defendants. That order resolves, with finality, all claims against a distinct set of parties (the State Bar and its agents), certain claims (e.g., Equal Protection)

1 against all Defendants, while leaving claims against unrelated co-defendants (PCL, Spiro, and  
2 Haight-represented Defendants) pending.  
3

4 In light of the procedural and substantive significance of Docket 312, Plaintiff now seeks  
5 certification under 28 U.S.C. § 1292(b), or alternatively, entry of a partial final judgment under Rule  
6 54(b) to preserve appellate rights and avoid duplication of proceedings.  
7

## 8 **II. CERTIFICATION UNDER 28 U.S.C. § 1292(B) IS APPROPRIATE**

9 Under 28 U.S.C. § 1292(b), a district court may certify an interlocutory order for appeal if:

- 10 1. The order involves a controlling question of law;
- 11 2. There is substantial ground for difference of opinion; and
- 12 3. An immediate appeal may materially advance the ultimate termination of the  
13 litigation.  
14

15 Each element is satisfied here:

### 16 **A. Controlling Question of Law**

17 Whether the dismissal of the State Bar Defendants was proper, despite Plaintiff's extensive  
18 allegations, judicially-noticed admissions, and procedural irregularities, is a controlling legal issue  
19 affecting the entire litigation framework. The denial of reconsideration (Dkt. 312) locked in a  
20 dispositive ruling based on legal sufficiency.  
21

### 22 **B. Substantial Grounds for Difference of Opinion**

23 This case involves novel questions of immunity, procedural due process under CPRA and  
24 internal grievance rights, and statutory duties of state licensing authorities, especially in light of post-  
25 dismissal factual developments that were not available at the time of the original dismissal.  
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Moreover, significant material submitted in Dockets 197, 199, and 241, including the State Bar's own admissions, was not considered in the original or reconsideration rulings.

### **C. Material Advancement of Litigation**

Immediate appellate review will clarify the legal boundaries of Plaintiff's claims against regulatory defendants, eliminate piecemeal appeals, and prevent inconsistent rulings or duplicative discovery.

### **III. ALTERNATIVELY, RULE 54(B) FINAL JUDGMENT IS WARRANTED**

If the Court declines to certify interlocutory appeal under § 1292(b), Plaintiff requests the entry of partial final judgment under Rule 54(b) as to the State Bar Defendants and the relevant dismissal of claims with prejudice.

Rule 54(b) permits final judgment where:

1. The court has resolved all claims against a particular party; and
2. There is no just reason for delay.

Both conditions are satisfied:

1. All claims against the State Bar Defendants were dismissed, and that dismissal was reaffirmed in Dkt. 312.
2. No just reason for delay exists. The State Bar Defendants are factually and legally distinct from the remaining parties. Delaying final judgment would prejudice Plaintiff's right to appeal and hinder efficient resolution of the matter.

### **IV. CONCLUSION**

Plaintiff respectfully requests that the Court:

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**PLAINTIFF'S CONSOLIDATED MOTION FOR (1) CERTIFICATION OF INTERLOCUTORY APPEAL UNDER 28 U.S.C. § 1292(b) AND (2) ENTRY OF PARTIAL FINAL JUDGMENT UNDER RULE 54(b)**

CASE 2:23-CV-01298-JLS-BFM

1. Certify the May 27, 2025 Order (Dkt. 312) for interlocutory appeal under 28 U.S.C. § 1292(b), and transmit it to the Ninth Circuit, or
2. In the alternative, enter partial final judgment as to the State Bar Defendants under Rule 54(b).

Certification or final judgment is particularly warranted where, as here, the record reflects ongoing confusion over procedural posture and the accumulation of judicially cognizable material post-dismissal.

Respectfully submitted,

Dated: June 18, 2025



**Todd R. G. Hill**  
**Plaintiff, In Propria Persona**

#### **STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**

The undersigned party certifies that this brief contains 771 words, which complies with the 7,000-word limit of L.R. 11-6.1.

Respectfully submitted,



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**PLAINTIFF'S CONSOLIDATED MOTION FOR (1) CERTIFICATION OF INTERLOCUTORY APPEAL UNDER 28 U.S.C. § 1292(b) AND (2) ENTRY OF PARTIAL FINAL JUDGMENT UNDER RULE 54(b)**

CASE 2:23-CV-01298-JLS-BFM

1 June 18, 2025  
2 Todd R.G. Hill  
3 Plaintiff, in Propria Persona  
4  
5

6 **Plaintiff's Proof of Service**

7 This section confirms that all necessary documents will be properly served pursuant to L.R. 5-  
8 3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a  
9 document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the  
10 CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court  
11 and (2) all pro se parties who have been granted leave to file documents electronically in the case  
12 pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service  
13 through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P.  
14 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal  
15 Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.  
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18 Respectfully submitted,  
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23 June 18, 2025  
24 Todd R.G. Hill  
25 Plaintiff, in Propria Persona  
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**EXHIBIT A**

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**PLAINTIFF’S CONSOLIDATED MOTION FOR (1) CERTIFICATION OF INTERLOCUTORY APPEAL  
UNDER 28 U.S.C. § 1292(b) AND (2) ENTRY OF PARTIAL FINAL JUDGMENT UNDER RULE 54(b)**

CASE 2:23-CV-01298-JLS-BFM